

REMARKS

Re-examination and allowance of the present application is respectfully requested.

Applicants respectfully traverse the Examiner's 35 U.S.C. §102(e) rejection of claims 1, 2, 5 and 8 as being anticipated by U.S. Patent No. 6,446,177 to TANAKA et al.

According to an embodiment of the claimed invention, a control block records identification data to an external memory and an internal memory. In addition, an operation is carried out (performed) to determine, when the external memory is detected to be mounted, whether the identification data recorded to the external memory and the identification data recorded to the internal memory are identical to each other (e.g., whether they are the same). A message is displayed that notifies a user that a different external memory has been mounted when the identification data of the two memories are different. Applicants submit that at least these features are lacking from TANAKA et al.

In setting forth this rejection, the Examiner refers Applicants to column 16, lines 48-53 of TANAKA et al, as disclosing the above-discussed feature of Applicants' claimed invention. Applicants submit that column 16, lines 48-53 does not disclose the above-discussed feature, but instead is directed to displaying a message indicating that a file (drive) is abnormal and is prevented from being forwarded (copied) when a memory card is attached to a computer or the like. In particular, Applicants submit that TANAKA et al. discloses attaching a "defective mark" to a file indicating that the file is "abnormal", so as to prevent its copying. Applicants submit that the "defective mark" merely represents whether the file is normal (e.g., copyable) or abnormal (e.g., not

copyable), and does not correspond to identification data that is capable of individually identifying a medium, as taught by Applicants' specification and specified in Applicants' claimed invention. Thus, Applicants submit that TANAKA et al. is incapable of displaying a message indicating that a different external memory has been attached, as specified by Applicants' claimed invention, as TANAKA et al. is not concerned with the memory itself, but with the file.

In TANAKA et al., an error message is displayed when a memory card is re-attached after being removed from a computer, and the memory card includes a file with the "defective mark". This mark indicates that the file is protected against unauthorized copying. Applicants submit that this is unrelated to providing an indication of whether a different memory has been re-attached. Further, Applicants submit that TANAKA et al. discloses that in a system, such as, for example, a music player, if the mark is determined to be a "defective mark", the file is still handled (e.g., played) as a normal file. Thus, when a "normal" mark is attached to a file of one of two different memory cards, while an "abnormal" mark is attached to a file of the other one of the two memory cards (e.g., the two memory cards have different marks), and when the two memory cards are switched (e.g., when the first memory card is removed and the second memory card is attached), the system of TANAKA et al. fails to display a message indicating that a different external memory has been attached, as is taught by Applicants' claimed invention.

Whereas Applicants' claimed invention enables a user to quickly determine (notice) that a different external memory has been attached by reading messages indicated by a controller, TANAKA et al. is submitted to be unable to display a message

representing that an external memory different from a previously attached memory has been attached, since TANAKA et al. merely determines whether or not a file is copyable by referring to a “mark”, which is submitted to differ from comparing identification data to individually identify a memory.

In view of the above, Applicants submit that TANAKA et al. fails to disclose, or even suggest, the above-noted claim elements. Accordingly, Applicants respectfully submit that the claims of the present application are not anticipated by TANAKA et al., and respectfully request withdrawal of the 35 U.S.C. §102 rejection of the pending claims, and passage of the present application to issue.

Applicants further respectfully traverse the various 35 U.S.C. §103(a) rejections set forth by the Examiner, submitting that neither U.S. Patent 6,631,427 to KUBO or U.S. Patent 6,038,199 to PAWLOWSKI et al. disclose that which is lacking from TANAKA et al. Specifically, Applicants submit that neither KUBO or PAWLOWSKI et al. discloses or suggests generating identification data that individually identifies an external memory or carries out identification data determination process to determine whether the identification data recorded in an external memory and the identification data recorded in an internal memory are identical to each other when the external memory is mounted, and for displaying a message that notifies that a different external memory has been mounted when the identification data are different from each other. Accordingly, Applicants submit that even if one attempted to combine the teachings of TANAKA et al.; KUBO; and PAWLOWSKI et al. in the various combinations suggested by the Examiner, one would fail to arrive at the presently claimed invention, as such a

combination would at least lack the above-discussed features. Accordingly, Applicants respectfully request that the various 35 U.S.C. §103 rejections be withdrawn.

Furthermore, Applicants submit that the dependent claims are allowable for at least the reasons discussed above with respect to the independent claims, and for additional features recited therein. For example, claim 2 specifies that the identification data is recorded to external and internal memories prior to recording data being recorded to the external memory. Claims 5, 8 and 9 specify that the identification data-generating block generates numerical value information at random to generate the identification data. Applicants submit that these features are not taught or suggested by the applied art of record, and thus additional grounds exist for concluding that the dependent claims are allowable.

In this regard, Applicants submit that even if one assumed the “defective mark” of TANAKA et al. corresponds to Applicants’ identification data (and Applicants submit such an assumption would be erroneous), the “defective mark” of TANAKA et al. does not comprise randomly generated numerical value information. TANAKA et al. specifically indicates (see column 16, lines 16-18) that a “normal mark” is represented by “FFh”, while a “defective mark” is represented by “00h”. Thus, Applicants submit that the marks of TANAKA et al. are not randomly generated values.

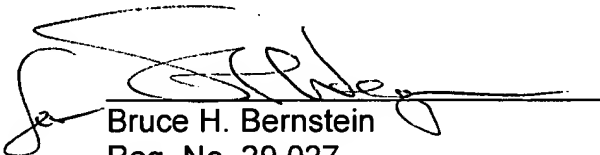
SUMMARY AND CONCLUSION

In view of the fact that none of the art of record, whether considered alone or in combination, discloses or suggests the present invention as now defined by the pending claims, and in further view of the above amendments and remarks, reconsideration of the Examiner's action and allowance of the present application are respectfully requested and are believed to be appropriate.

Should an extension of time be necessary to maintain the pendency of this application, including any extensions of time required to place the application in condition for allowance by an Examiner's Amendment, the Commissioner is hereby authorized to charge any additional fee to Deposit Account No. 19-0089.

If there should be any questions concerning this application, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,
Nobuyuki KOBAYASHI et al.


Bruce H. Bernstein
Reg. No. 29,027

November 3, 2005
GREENBLUM & BERNSTEIN, P.L.C.
1950 Roland Clarke Place
Reston, VA 20191
(703) 716-1191

Steven Wegman
Reg. No. 31,438